EXHIBIT A

Local Patent Rule 11: Joint Claim Terms Chart
Chewy, Inc. v. International Business Machines Corporation, Case No. 1:21-CV-01319-JSR

Agreed-Upon Claim Terms or Phrases:

U.S. Patent No. 7,072,849

Claim Term(s) or Phrase(s)	Agreed Construction(s)
"object(s)" (claims 1, 2, 3, 13, 14,15,16)	data structure(s)
"application(s)" (claims 1, 4, 7, 8, 13, 14, 17, 20)	information events composed of a sequence of one or more pages opened at a screen
"computer network" / "the network" (claims 1, 2, 8, 9, 12, 13, 14, 15, 21, 25)	two or more interconnected computers
"structuring advertising in a manner compatible to that of the applications so that it may be presented" (claims 1, 14)	formatting advertising for potential use with a plurality of applications
"structuring the advertising objects in a manner compatible to that of the applications so that it may be presented" (claim 13)	formatting the advertising objects for potential use with a plurality of applications
"at a second portion of one or more screens of display concurrently with applications" (claims 1, 13)	at a second area of one or more screens of display concurrently with applications
"advertising data" (claims 1, 8, 9, 12, 14, 21, 22, 25)	data whose subject matter is selected to concern advertising
"structuring applications so that they may be presented … at a first portion of one or more screens of display" (claims 1, 13)	formatting applications so that they may be presented . . . at a first area of one or more screens of display
"structuring applications so that a user requested application may be presented, through the network, at a first portion of one or more screens of display" (claim 14)	formatting applications so that a user requested application may be presented, through the network, at a first area of one or more screens of display

Disputed Claim Terms or Phrases:

U.S. Patent No. 7,072,849

Disputed Claim Term(s) or Phrase(s)	Chewy's Proposed Construction(s)	IBM's Proposed Construction(s)	Cross References
"selectively storing advertising objects at a store established at the reception system" (claims 1, 13, 14)	pre-fetching advertising objects and storing at a store established at the reception system in anticipation of display concurrently with the applications	storing advertising objects according to a predetermined storage criterion at a store established at the reception system	**Infringement Contentions:** Ex. A, pp. 29-36, 66, 67-68; Ex. B, pp. 27-41, 79, 81. **Invalidity Contentions:** Ex. A-1, pp. 42-63, 156-157; Ex. A-2, pp. 44-66, 159-160; Ex. A-3, pp. 44-65, 160-161; Ex. A-4, pp. 43-65, 158, 160; Ex. A-5, pp. 41-63, 154, 156; Ex. A-6, pp. 42-63, 154-156; Ex. A-7, pp. 3, 7, 9.
"structuring advertising so that it may be selectively supplied to and retrieved at the reception systems for presentation" (claim 8)	formatting advertising for potential supply to and retrieval by the reception systems for presentation	formatting advertising in a manner comparable to that of applications, and so that it may be selectively supplied to and retrieved at the reception systems, to enable the advertising to be presented	**Infringement Contentions:** Ex. A, pp. 51-59; Ex. B, pp. 58-69. **Invalidity Contentions:** Ex. A-1, pp. 136-151; Ex. A-2, pp. 139-154; Ex. A-3, pp. 139-154; Ex. A-4, pp. 138-154; Ex. A-5, pp. 137-152; Ex. A-6, pp. 136-152; Ex. A-7, p. 5.

"structuring advertising separately from the applications so that the advertising may be selectively supplied, through the network, to and retrieved at the reception systems for presentation" (claim 21)	formatting advertising separately from the applications for potential supply, through the network, to and retrieval by the reception systems for presentation	formatting advertising in a manner comparable to that of applications to enable the applications to be presented at a first portion of a display and the advertising to be presented concurrently at a second portion of a display and so that it may be selectively supplied to, through the network, and retrieved at the reception systems	**Infringement Contentions:** Ex. A, pp. 70-71; Ex. B, p. 84. **Invalidity Contentions:** Ex. A-1, p. 160; Ex. A-2, p. 163; Ex. A-3, p. 164; Ex. A-4, p. 162; Ex. A-5, pp. 158-159; Ex. A-6, p. 158; Ex. A-7, pp. 11-12.
"advertising object(s)" (claims 1, 2, 3, 13, 14, 15, 16)	data structure(s) whose subject matter concerns advertising	objects that (1) contain display data to be presented at screen partitions and (2) whose subject matter is selected to concern advertising	**Infringement Contentions:** Ex. A, pp. 29-42, 65-68; Ex. B, pp. 27-46, 79, 81-82. **Invalidity Contentions:** Ex. A-1, pp. 42-91, 156-158; Ex. A-2, pp. 44-93, 159-161; Ex. A-3, pp. 44-93, 160-162; Ex. A-4, pp. 43-93, 158-160; Ex. A-5, pp. 41-91, 154-156; Ex. A-6, pp. 42-91, 154-156; Ex. A-7, pp. 2-3, 7-9.
"characterization(s)" (claims 3, 4, 5, 6, 7, 8, 16, 17, 18, 19, 20, 21)	data indicative of a user characteristic, such as demographics, geography, or usage history	targeting criteria for users as defined by interaction history with the service and such other information as user demographics and locale	**Infringement Contentions:** Ex. A, pp. 39-47, 49-59, 68-71; Ex. B, pp. 41-54, 56-69, 81-83, 84. **Invalidity Contentions:** Ex. A-1, pp. 83-121, 129-

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			151, 158-160; Ex. A-2, pp. 85-124, 131-154, 161-163; Ex. A-3, pp. 86-124, 131-154, 162-164; Ex. A-4, pp. 85-123, 131-154, 160-162; Ex. A-5, pp. 83-122, 129-152, 156-159; Ex. A-6, pp. 83-121, 129-152, 156-158; Ex. A-7, pp. 3-5, 9-12.

U.S. Patent No. 9,569,414

Disputed Claim Term or Phrase	Chewy's Proposed Constructions	IBM's Proposed Constructions	Cross References
"the method performed by a processor" (claim 1)	each step of the method is performed by a single processor	[no construction necessary]	**Infringement Contentions:** Ex. C, pp. 1-11. **Invalidity Contentions:** Ex. B-1, pp. 2-6; Ex. B-2, pp. 1-2; Ex. B-3, pp. 1-3; Ex. B-4, pp. 1-5.
"requesting a set of JavaScript objects and a set of JavaScript functions in a single Hypertext Transfer Protocol (HTTP) request" (claim 1)	transmitting only one HTTP request to retrieve both the set of JavaScript objects and the set of JavaScript functions	[no construction necessary]	**Infringement Contentions:** Ex. C, pp. 11-19. **Invalidity Contentions:** Ex. B-1, pp. 6-15; Ex. B-2, pp. 2-7; Ex. B-3, pp. 3-6; Ex. B-4, pp. 5-11.
"formatting the set of JavaScript objects using the set of JavaScript functions as a parameter" (claim 1)	indefinite	formatting the set of JavaScript objects, using the set of JavaScript functions, as a parameter	**Infringement Contentions:** Ex. C, pp. 27-31.

Disputed Claim Term or Phrase	Chewy's Proposed Constructions	IBM's Proposed Constructions	Cross References
			Invalidity Contentions: Ex. B-1, p. 28; Ex. B-2, pp. 20-25; Ex. B-3, pp. 10-16; Ex. B-4, pp. 12-21.
"data conglomeration engine" (claim 3)	program which receives an HTTP request and obtains the JavaScript functions and JavaScript objects	program that acts as a controller that breaks down incoming requests, translates the requested methods and parameters to combine data elements from different data sources into a single data content	**Infringement Contentions:** Ex. C, pp. 48-50. **Invalidity Contentions:** Ex. B-1, p. 30; Ex. B-2, p. 34; Ex. B-3, p. 22; Ex. B-4, pp. 26-29.

U.S. Patent No. 7,076,443

Disputed Claim Term or Phrase	Chewy's Proposed Constructions	IBM's Proposed Constructions	Cross References
"associated advertisement" (claim 1)	indefinite	[no construction necessary]	**Infringement Contentions:** Ex. D, pp. 1-10, 14-41; Ex. E., pp. 1-6, 9-17. **Invalidity Contentions:** Ex. C-1, pp. 3-11; Ex. C-2, pp. 3-11; Ex. C-3, pp. 3-4, 8-15; Ex. C-4, pp. 3-7; Ex. C-5, pp. 3-8; Ex. C-6, pp. 3, 6-11; Ex. C-7; pp. 3-7.

Disputed Claim Term or Phrase	Chewy's Proposed Constructions	IBM's Proposed Constructions	Cross References
"Internet search" (claim 1)	search through an Internet search engine, e.g. google.com or yahoo.com	[no construction necessary]	**Infringement Contentions:** Ex. D, pp. 1-14; Ex. E, pp. 1-9. **Invalidity Contentions:** Ex. C-1, pp. 3-4; Ex. C-2, pp. 3-5; Ex. C-3, pp. 3-8; Ex. C-4, pp. 3-4; Ex. C-5, p. 3; Ex. C-6, pp. 3-5; Ex. C-7; pp. 3-4.
"correlating said at least one associated advertisement with said at least one search result item" (claim 1)	indefinite	[no construction necessary]	**Infringement Contentions:** Ex. D, pp. 30-41; Ex. E, pp. 15-17. **Invalidity Contentions:** Ex. C-1, p. 11; Ex. C-2, pp. 8-11; Ex. C-3, pp. 12-15; Ex. C-4, pp. 6-7; Ex. C-5, p. 8; Ex. C-6, pp. 10-11; Ex. C-7; pp. 6-7.
"providing said at least one associated advertisement on demand by said user" / "on demand by said user" (claim 2)	indefinite	"on demand by said user": upon the user selecting a graphical user interface to investigate related advertisements	**Infringement Contentions:** Ex. D, pp. 41-42; Ex. E, pp. 18-22. **Invalidity Contentions:** Ex. C-1, p. 12; Ex. C-2, pp. 11-12; Ex. C-3, pp. 15-16; Ex. C-4, pp. 8; Ex. C-5, p. 8; Ex. C-6, pp. 11-13; Ex. C-7; pp. 7.

Disputed Claim Term or Phrase	Chewy's Proposed Constructions	IBM's Proposed Constructions	Cross References
"said graphical user interface comprises a product icon" (claims 8, 18)	indefinite	[no construction necessary]	**Infringement Contentions:** Ex. D, pp. 67-68, 143-144; Ex. E, pp. 45-46, 87-89. **Invalidity Contentions:** Ex. C-1, p. 17-18, 39,40; Ex. C-2, pp. 15-16, 40-41; Ex. C-3, pp. 21-22, 45; Ex. C-4, pp. 12, 19-20; Ex. C-5, p. 12-13, 25-26; Ex. C-6, pp. 20-21, 43; Ex. C-7; pp. 11, 23-24.
"related product advertisement(s)" (claims 9, 17)	indefinite	[no construction necessary]	**Infringement Contentions:** Ex. D, pp. 68-71, 140-143; Ex. E, pp. 46-49, 84-87. **Invalidity Contentions:** Ex. C-1, p. 19-20, 38-39; Ex. C-2, pp. 16, 40; Ex. C-3, pp. 22, 44; Ex. C-4, pp. 12-13, 19; Ex. C-5, p. 13, 25; Ex. C-6, pp. 21, 17; Ex. C-7; pp. 12-13, 23.
"a user identifier" / "assigning a user identifier" / "an identifier for said user" (claim 10, 16)	indefinite	"user identifier": session value that is used to associate user queries to search result item selections	**Infringement Contentions:** Ex. D, pp. 71-77, 139-140; Ex. E, pp. 49-55, 82-84. **Invalidity Contentions:** Ex. C-1, p. 20-22; Ex. C-2, pp. 16-19; Ex. C-3, pp. 22-24;

Disputed Claim Term or Phrase	Chewy's Proposed Constructions	IBM's Proposed Constructions	Cross References
			Ex. C-4, p. 13; Ex. C-5, p. 13-15; Ex. C-6, pp. 22; Ex. C-7; pp. 13-14.
"matching said search result items to said related advertisements" (claim 15)	indefinite	[no construction necessary]	**Infringement Contentions:** Ex. D, pp. 102-109; Ex. E, pp. 69-72. **Invalidity Contentions:** Ex. C-1, p. 25-31; Ex. C-2, pp. 26-30; Ex. C-3, pp. 27-30; Ex. C-4, p. 17; Ex. C-5, p. 17-22; Ex. C-6, pp. 31-34; Ex. C-7; pp. 18-20.
"related advertisement(s)" (claims 15, 19, 20)	indefinite	[no construction necessary]	**Infringement Contentions:** Ex. D, pp. 95-117, 120-139, 144-149; Ex. E, pp. 64-76, 77-82, 89-92. **Invalidity Contentions:** Ex. C-1, p. 24-35, 41; Ex. C-2, pp. 25-39, 41-43; Ex. C-3, pp. 27-44, 45-46; Ex. C-4, p. 16-18, 20-21; Ex. C-5, p. 17-23, 27; Ex. C-6, pp. 30-42, 44; Ex. C-7; pp. 17-22, 24.

U.S. Patent No. 6,704,034

Disputed Claim Term or Phrase	Chewy's Proposed Constructions	IBM's Proposed Constructions	Cross References
"object type(s)" (claims 1, 2, 29, 30, 51)	type(s) of object(s) (e.g., a graphic object, image object, video object, text object, or audio object)	[no construction necessary]	**Infringement Contentions:** Ex. F, pp. 5-6, 11, 16-17, 33, 40, 124-125, 152-153, 161-162 **Invalidity Contentions:** D-1, pp. 3-14, 50-61, 97-107; D-2, pp. 5-13, 45-55, 88-96; D-3, pp. 8-28, 94-120, 186-209; D-4, pp. 4-13, 43-54, 85-96.
"context(s)" (claims 11, 16, 17, 18, 20, 22, 39, 44, 45, 46, 48, 50, 52)	object information type(s) (e.g., textual information, graphic information, image information, video information, or audio information)	way(s) in which information is being presented in a data processing system	**Infringement Contentions:** Ex. F, pp. 58-59, 63, 67-68, 76, 78, 82, 88, 91-92, 98-99, 108, 116, 123, 132-134, 140-142, 147-149, 178-179, 183, 187-188, 195-196 **Invalidity Contentions:** D-1, pp. 29-46, 47-49, 75-92, 94-96, 109-117; D-2, pp. 28-45, 63-84, 96-105; D-3, pp. 53-84, 91-94, 135-176, 183-186, 210-237; D-4, pp. 23-43, 61-85, 96-107.
"magnifying the information is performed selectively such that	indefinite	[no construction necessary]	**Infringement Contentions:**

only a selected context is magnified" (claims 20, 48)			Ex. F, pp. 108, 116, 147-148 **Invalidity Contentions:** D-1, pp. 47-48, 94-95; D-2, pp. 42-45, 81-84; D-3, pp. 91-92, 183-184; D-4, pp. 41-42, 83-84.
"monitoring means for monitoring for a change in focus on the information from a first portion of the information to a second portion of the information" (claim 39)	<u>Function</u>: monitoring for a change in focus on the information from a first portion of the information to a second portion of the information <u>Structure</u>: no corresponding structure (indefinite)	<u>Function</u>: monitoring for a change in focus on the information from a first portion of the information to a second portion of the information <u>Structure</u>: a computer system with program code for waiting for pointer movement and detecting pointer movement over a different location *See* Fig. 5 and accompanying text.	**Infringement Contentions:** Ex. F, pp. 131-132 **Invalidity Contentions:** D-1, pp. 74-75; D-2, pp. 66-67; D-3, pp. 141-144; D-4, pp. 63-65.
"identifying means . . . for identifying an object type for the object" (claim 29)	<u>Function</u>: identifying an object type for the object <u>Structure</u>: no corresponding structure (indefinite)	<u>Function</u>: identifying an object type for the object <u>Structure</u>: a computer system with program code for detecting pointer movement over a new object to magnify	**Infringement Contentions:** Ex. F, pp. 124-125 **Invalidity Contentions:** D-1, pp. 50-59; D-2, pp. 49-51; D-3, pp. 100-112; D-4, pp. 45-51.

		and determining the object type of the object *See* Fig. 6 and accompanying text.	
"identifying means for identifying a context of the second portion of the information second" (claim 39)	<u>Function</u>: identifying a context of the second portion of the information <u>Structure</u>: no corresponding structure (indefinite)	<u>Function</u>: identifying a context of the second portion of the information <u>Structure</u>: a computer system with program code for detecting pointer movement over a new portion of information to magnify and determining the context of the portion of information *See* Fig. 6 and accompanying text.	**Infringement Contentions:** Ex. F, pp. 132 **Invalidity Contentions:** D-1, pp. 75-81; D-2, pp. 68-69; D-3, pp. 145-157; D-4, pp. 65-70.
"magnifying means for magnifying presentation of the object based on the object type of the object" (claim 29)	<u>Function</u>: magnifying presentation of the object based on the object type of the object <u>Structure</u>: the magnification processes described in the '034 patent, including: magnifying text by changing font size, as described at 8:4-25 & Fig. 7 (steps 704-712); magnifying an image by presenting a larger version of the image in a window	<u>Function</u>: magnifying presentation of the object based on the object type of the object <u>Structure</u>: a computer system with program code for querying available objects for presentation, selecting a magnified object from list of objects, and displaying said magnified object	**Infringement Contentions:** Ex. F, pp. 126-127 **Invalidity Contentions:** D-1, pp. 59-60; D-2, pp. 52-54; D-3, pp. 112-118; D-4, pp. 51-53.

	overlaying the original image, as described at 8:31-41 & Fig. 8 (steps 800-806); and magnifying audio by adjusting the volume and tone, as described at 8:48-59 & Fig. 9 (steps 900-904).	*See* Fig. 7, Steps 700-708; Fig. 8, Steps 800-802; Fig. 9; and accompanying text.	
"magnifying means for magnifying presentation of the information based on the context of the second portion of the information" (claim 39)	<u>Function</u>: magnifying presentation of the information based on the context of the second portion of the information <u>Structure</u>: the magnification processes described in the '034 patent, including: magnifying text by changing font size, as described at 8:4-25 & Fig. 7 (steps 704-712); magnifying an image by presenting a larger version of the image in a window overlaying the original image, as described at 8:31-41 & Fig. 8 (steps 800-806); and magnifying audio by adjusting the volume and tone, as described at 8:48-59 & Fig. 9 (steps 900-904).	<u>Function</u>: magnifying presentation of the information based on the context of the second portion of the information <u>Structure</u>: a computer system with program code for querying available information for presentation, selecting a magnified portion of information from list of portions of information, and displaying said magnified information *See* Fig. 7, Steps 700-708; Fig. 8, Steps 800-802; Fig. 9; and accompanying text.	**Infringement Contentions:** Ex. F, pp. 132-133 **Invalidity Contentions:** D-1, pp. 82-83; D-2, pp. 69-72; D-3, pp. 157-162; D-4, pp. 70-72.
"displaying means for displaying the image using a second bitmap	<u>Function</u>: displaying the image using a second bitmap size	<u>Function</u>: displaying the image using a second bitmap	**Infringement Contentions:** Ex. F, pp. 142, 146

size having more pixels than the first bit map size" (claim 46)	having more pixels than the first bit map size Structure: the process for displaying a larger version of an image in a window overlaying the original image, as described at 8:37-40 & Fig. 8 (steps 804-806)	size having more pixels than the first bit map size Structure: a computer system with program code for creating an overlay magnification for the image object and displaying the magnified image object in that window *See* Fig. 8, Steps 804-806; and accompanying text.	**Invalidity Contentions:** D-1, pp. 92-93; D-2, pp. 78-80; D-3, pp. 175-176; D-4, pp. 81.

U.S. Patent No. 7,496,831

Disputed Claim Term or Phrase	Chewy's Proposed Constructions	IBM Proposed Constructions	Cross References
"virtual display" (claim 1)	a display onto which the page is projected prior to displaying it to the user	a web browser unit where webpage content is projected by the server for display based on processed language interpretation	**Infringement Contentions:** Ex. G, pp. 8-12, 16-21. **Invalidity Contentions:** Ex. E-1, pp. 12-14, 15-20; Ex. E-2, pp. 4-8, 16-29; Ex. E-3, pp. 5-9, 17-31; Ex. E-4, pp. 9-16, 21-36.
"determining whether the rendered page falls within a proximity policy" (claim 1)	determining whether the page projected on the virtual display satisfies the minimal spacing criteria between hyperlinks within the projected page	[no construction necessary beyond that for other claim terms]	**Infringement Contentions:** Ex. G, pp. 12-16. **Invalidity Contentions:** Ex. E-1, pp. 14-15; Ex. E-2,

Disputed Claim Term or Phrase	Chewy's Proposed Constructions	IBM Proposed Constructions	Cross References
			pp. 8-16; Ex. E-3, pp. 9-17; Ex. E-4, pp. 16-21.
"proximity policy" (claims 1-4, 8, 9)	user-defined policy specifying spacing rules for hyperlinks	policy defining spacing rules	**Infringement Contentions:** Ex. G, pp. 12-21, 25-40, 55-62. **Invalidity Contentions:** Ex. E-1, pp. 14-25, 27-33; Ex. E-2, pp. 8-29, 32-34; Ex. E-3, pp. 9-31, 35-37, 40-51; Ex. E-4, pp. 16-36, 40-44, 47-56.
"reformatting the rendered page to fall within the proximity policy includes at least one of a hypertext markup language (HTML) tag and a cascading style sheet" (claim 2)	indefinite	[no construction necessary]	**Infringement Contentions:** Ex. G, pp 25-30. **Invalidity Contentions:** Ex. E-1, p. 21; Ex. E-2, p. 32; Ex. E-3, pp. 35-36; Ex. E-4, pp. 40-41.